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Co., GEICO Indemnity Co., GEICO General Insurance  
Company and GEICO Casualty Co.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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GOVERNMENT EMPLOYEES INSURANCE CO.,  
GEICO INDEMNITY CO., GEICO GENERAL  
INSURANCE COMPANY, and GEICO CASUALTY  
CO.,

Case No.: 2:20-cv-05832-CCC-ESK

Plaintiffs,

—against—

OASIS MEDICAL AND SURGICAL WELLNESS  
GROUP, LLC, RALPH DANIEL, P.A., KEITH  
JOHNSON, M.D., SUJAL PATEL, M.D., SAMUEL  
SCHENKER, M.D., SAMMY MASRI, M.D., and  
RALPH WHEELER, M.D.,

Defendants.

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**DECLARATION OF MICHAEL VANUNU**

Michael Vanunu, pursuant to 28 U.S.C. § 1746, hereby declares the truth of the following:

1. I am associated with the law firm of Rivkin Radler LLP and am counsel for Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company and GEICO Casualty Co. (“Plaintiffs” or “GEICO”) in this matter.

2. I have personal knowledge of the facts set forth in this declaration, and would testify as to them in a court of law if required to do so.

3. I respectfully submit this declaration in support of the joint motion by all of the parties in this action for entry of the Discovery Confidentiality Order that is annexed hereto as Exhibit A.

4. Pursuant to Local Civil Rule 5.3, I hereby certify that: (i) the nature of the materials that will be kept confidential are the parties' internal corporate records, financial records, and patient records; (ii) the parties have legitimate interests in maintaining the confidentiality of these materials, inasmuch as they include sensitive commercial and financial information, as well as the healthcare records of Defendants' patients and Plaintiffs' insureds; and (iii) should the order not be entered, the disclosure of these materials outside of the scope of this litigation would result in clearly defined and serious injury to the parties and their respective businesses, including the loss of competitive advantage, and exposure to liability to third parties.

4. The proposed Discovery Confidentiality Order that is annexed hereto as Exhibit A is in the form that is available on the Court's website as Appendix S to the Local Civil Rules.

5. Accordingly, the parties jointly and respectfully request that the Court enter the proposed Confidentiality Order that is annexed hereto as Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: October 28, 2020

/s/ Michael Vanunu  
MICHAEL VANUNU